

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Creation of a Low)	MM Docket No. 99-25
Power Radio Service)	
)	

To: The Commission

**COMMENTS OF
NATIONAL PUBLIC RADIO, INC. AND
MOTION FOR EXTENSION OF TIME**

National Public Radio, Inc. ("NPR") hereby comments in support of the motion for extension of time filed on July 29, 2005, by the Station Resource Group ("SRG") and, pursuant to Section 1.46 of the Commission's Rules, 47 C.F.R. § 1.46, respectfully requests an extension of the deadline for filing reply comments in this proceeding.¹ As set forth below, NPR believes there is good cause for the Commission to provide an extension of the comment filing deadline to and including September 7, 2005, as requested by the SRG, and an extension of the reply comment filing deadline to and including October 7, 2005.

NPR is a nonprofit membership corporation that produces, acquires, and distributes news, information, and cultural programming for broadcast by more than 790 affiliated noncommercial educational ("NCE") stations nationwide. In

¹ See 70 Fed. Reg. 39,217 (July 7, 2005) [hereinafter "Federal Register Notice"].

addition to broadcasting award winning NPR programming, including *All Things Considered*[®], *Morning Edition*[®], *Talk Of The Nation*[®], and *Performance Today*[®], NPR's Member stations are significant producers of news, informational, and cultural programming. In addition, NPR provides representation and other services to its Member stations and operates the Public Radio Satellite Interconnection System.

In its Motion, the SRG seeks a modest 30 day extension of time to permit it to obtain additional input from its membership at its annual organizational meetings on the issues raised in the Further Notice of Proposed Rulemaking.² The additional time will also enable other parties to more fully consider the issues raised in the proceeding, develop relevant factual information, and prepare comments for submission. While extensions of time are not routinely granted³ and should not be lightly requested, granting SRG's Motion will facilitate the creation of a more complete record on which to decide what, if any, regulatory action is warranted in this proceeding and is unlikely to prejudice any interested party.

As a separate matter, NPR requests that the Commission extend the deadline for filing reply comments. Currently, reply comments are due 15 days after the filing of comments, or August 22, 2005.⁴ In NPR's experience, a 15 day reply comment period is an unusually brief period of time in a proceeding of this

² Station Resource Group, Motion for Extension of Time, MM Docket No. 99-25, at 1 (filed July 29, 2005).

³ 47 C.F.R. § 1.46(a).

⁴ Federal Register Notice at 39,217.

nature.⁵ The Further Notice of Proposed Rulemaking contemplates a number of potentially far reaching changes to longstanding Commission rules and, as in other phases of this proceeding, a large number of comments are likely to be filed.⁶ The additional time will enable all parties to consider and respond to the initial comments filed without prejudice to anyone.

Accordingly, for good cause having been shown, NPR urges the Commission to grant the SRG Motion seeking an extension of the deadline for filing comments to and including September 7, 2005, and extend the deadline for filing reply comments to and including October 7, 2005.

Respectfully Submitted,

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General Counsel and Secretary
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⁵ Compare, e.g., In the Matter of Broadcast Localism, Notice of Inquiry, MM Docket No. 05-233 (rel. July 1, 2004) (providing a 30-day period for filing reply comments); In the Matter of Digital Audio Broadcasting Systems and Their Impact on the Terrestrial Radio Broadcast Service, Further Notice of Proposed Rulemaking and Notice of Inquiry, MM Docket No. 99-325 (rel. Apr. 20, 2004) (providing a 30-day period for filing reply comments).

⁶ See In the Matter of Creation of Low Power Radio Service, Report and Order, 15 FCC Rcd. 2205, at 2207 (2000) (noting the Commission's receipt of "comments and letters from thousands of individuals and groups").

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